## Attachment 4

# Bell Atlantic-New York's Post-Hearing Reply Brief on Physical and Virtual Collocation

**Proprietary Information Redacted** 

# **ATTACHMENT 5**

# TARIFF FILINGS FOR NONRECURRING SPACE PREPARATION CHARGES

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY



February 16, 1993

Transmittal No. 165

Secretary, Federal Communications Commission Washington, D.C. 20554

ATTENTION: Common Carrier Bureau

The accompanying tariff filing, issued by the NYNEX Telephone Companies (NTCs), and bearing Tariff F.C.C. No. 1, effective May 17, 1993, is sent to you for filing in compliance with the requirements of the Communications Act of 1934, as amended. The filing consists of tariff pages as indicated on the following check sheets:

Tariff F.C.C. No.	Check Sheet No.		
1	165th Revised Page 1		
	35th Revised Page 2		
•	2nd Revised Page 2.1		
	53rd Revised Page 3		
	34th Revised Page 4		
	32nd Revised Page 6		
	45th Revised Page 7		
	7th Revised Page 9		
	60th Revised Page 10		
	6th Revised Page 10.1		
	Original Page 10.2		
	65th Revised Page 11		
	49th Revised Page 12		
	35th Revised Page 13		

This filing is issued under authority of Special Permission No. 93-161 of the Federal Communications Commission and in compliance with the F.C.C. Report and Order and Notice of Proposed Rulemaking, In the Matter of Expanded

Interconnection with Local Telephone Company Facilities, CC Docket No. 91-141; and Amendment of the Part 69 Allocation of General Support Facility Costs, CC Docket No. 92-222, adopted September 17, 1992 and released October 19, 1992.

With this filing, the NTCs are introducing rates and regulations for Expanded Interconnection for 1.544 Mbps and 44.736 Mbps (Electrical) High Capacity Special Access services on a permanent basis.

In addition, this filing removes tariff language no longer required which provided for rates and regulations for Interim Expanded Interconnection. Interim Expanded Interconnection Arrangements will be converted to permanent Special Access Expanded Interconnection coincident with the effective date of this tariff filing.

Supporting information required under Section 61.49 of the Commission's Rules, to the extent applicable, is included with this filing.

Acknowledgment and date of receipt of this filing are requested. A duplicate letter of transmittal is attached for this purpose.

Pursuant to Section 61.32(b), the original of this transmittal letter (without attachment), together with FCC Form 155 and the statutory fee payment in the amount of \$490.00, as required by Section 1.1107 of the Commission's Rules, is being sent via same-day commercial courier service for delivery to the Mellon Bank in Pittsburgh, PA., on February 16, 1993. Copies of the transmittal letter, together with attachments, being filed pursuant to Section 61.32(a) and (c), will be filed by hand on February 16, 1993.

Questions on the payment or inquiries, comments and petitions regarding this filing should be addressed to the Executive Director - Federal Regulatory Matters at the above address.

J.J. Goldberg (cmo)

Attachments:
Duplicate Letter
Tariff Pages
Supporting Information

Copy of Letter and Attachments, Concurrently delivered to: Chief, Tariff Review Branch (Public Reference Copy) International Transcription Services, Inc.

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Elbechue 5/17/93

NYNEX TELEPHONE COMPANIES

TARIFF F.C.C. NO. 1

DESCRIPTION AND JUSTIFICATION

EXPANDED INTERCONNECTION
HITH 1.544 Mbps AND 44.736 Mbps
SPECIAL ACCESS SERVICES

#### NYNEX TELEPHONE COMPANIES TARIFF F.C.C. NO. 1 DESCRIPTION AND JUSTIFICATION

## **EXPANDED INTERCONNECTION** WITH 1.544 Mbps AND 44.736 Mbps SPECIAL ACCESS SERVICES

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#### I. INTRODUCTION

In this filing, New England Telephone and Telegraph Company ("NET") and New York Telephone Company ("NYT") (collectively, the "NYNEX Telephone Companies" or "NTCs") propose to revise their Tariff F.C.C. No. 1 to introduce interstate expanded interconnection for certain High Capacity Special Access services on a permanent basis. This filing is being made pursuant to Commission Order on 90 days notice.

With this filing, the NTCs propose to replace interim expanded interconnection arrangements with permanent expanded interconnection for interstate 1.544 Mbps ("DS1") and 44.736 Mbps ("DS3") Special Access services. Expanded interconnection provides customers with: (i) space within a NTC serving wire center ("SWC") to locate certain fiber optic or microwave facilities and transmission equipment; and (ii) connection(s) to NTC-provided DS1 or DS3 services. The NTCs propose to offer expanded interconnection by physical collocation. The NTCs do not plan to offer expanded interconnection by virtual collocation.

At the direction of the Commission, the NTCs filed interim expanded interconnection arrangements which generally "mirror" existing state expanded interconnection arrangements in New York and Massachusetts. With this filing, the NTCs propose to introduce a unified approach for permanent interstate expanded interconnection in the NYNEX region. For

Expanded Interconnection with Local Telephone Company Facilities, 7 FCC Rcd 7369, at ¶ 259 (1992) ("Expanded Interconnection Order").

the most part, differences between interim expanded interconnection arrangements in New York and Massachusetts have been reconciled.

The NTCs propose a rate structure for permanent expanded interconnection that is substantially similar to the interim expanded interconnection rate structure, i.e., recurring and nonrecurring charges for space and recurring and nonrecurring charges for Office Channel Terminations ("OCTs"). As directed by the Commission, this filing provides cost support for permanent expanded interconnection rate elements. The NTCs have priced these rate elements to recover direct costs, plus uniform overhead loadings, i.e., fully distributed costs ("FDC"). As required by the Commission, the proposed expanded interconnection rates do not include contribution.

For expanded interconnection space that will be used jointly for intrastate and interstate services, the NTCs propose to apply their state and interstate recurring and nonrecurring space rates proportionately based on percent interstate (and intrastate) use of the space ("PIU"). The customer shall provide PIUs for its expanded interconnection spaces based on the number of intrastate and interstate voice grade equivalent cross connections to each jointly used space. The customer may update its PIUs on a quarterly basis.

The NTCs' proposed rates for permanent expanded interconnection differ from interim expanded interconnection rates. There are several reasons for this. Interim expanded interconnection was filed using state rates for expanded interconnection, less contribution. In some instances, the NTCs developed state rates for expanded interconnection through

negotiation with their customers. Even in those instances in which the NTCs based their state rates on costs, they did not use the Commission's direct cost plus uniform overhead loading pricing methodology. Moreover, the NTCs developed state rates for expanded interconnection without the benefit of any experience in providing these services. Where available, the NTCs used the actual costs of providing state expanded interconnection services to develop the cost support in this filing.

The NTCs do not propose to file expanded interconnection for Special Access services other than DS1 and DS3 services at this time. The Commission did not require local exchange carriers to file interstate Expanded Interconnection tariffs for Special Access services other than DS1 and DS3 services until after receipt of a bona fide request for such service. If the NTCs receive a bona fide request for expanded interconnection for interstate Special Access service other than DS1 or DS3 service, the NTCs will file tariffs within 45 days of receipt of such request to be effective upon 45 days notice.

Expanded Interconnection Order, at ¶ 259.

#### II. SERVICE DESCRIPTION

Expanded interconnection provides customers with space and associated requirements such as power and environmental conditioning within a NTC SMC to locate certain fiber optic or microwave facilities and equipment and a connection to NTC-provided DS1 or DS3 (electrical) High Capacity services. 3

#### A. Space

There are four types of space provided under expanded interconnection:

(1) multiplexing node space; (ii) roof space; (iii) transmitter/receiver space; and (iv) cable space. Under fiber optic expanded interconnection, the NTCs will provide the customer space for its multiplexing node and fiber optic cable facilities to connect its network to the multiplexing node. Under microwave expanded interconnection, the NTCs will provide the customer space for its multiplexing node, roof space for a microwave antenna (and supporting structure, if needed), transmitter/receiver space and cable space to connect its microwave antenna and its multiplexing node. The NTCs will also provide space, power, heat, air conditioning and other environmental support to the customer's equipment, in the same manner that they provide such support items to their own equipment within that SHC.

Because microwave expanded interconnection requires a microwave antenna and/or supporting structure(s) to be attached to the roof or exterior walls of the SMC, the NTCs will provide microwave expanded interconnection only where the construction of such antenna and/or supporting structure is feasible.

Terms and conditions relating the provision of expanded interconnection space are set forth in the Section 28 of the proposed tariff and in technical specifications identified in the tariff. An overview of these terms and conditions is provided below.

Unless otherwise negotiated with the NTCs due to space limitations in the SMC, the customer's multiplexing node is subject to a minimum size requirement of 100 square feet and a maximum size of 300 square feet, with a height of approximately 8 feet. The customer may locate within its multiplexing node the following types of equipment:

- Optical Line Termination Multiplexers
- Central Office Multiplexers
- Digital Cross Connect Systems
- Microwave Modem Controllers
- Repeaters

In addition to the above, the customer may locate transmitter/receiver equipment in the multiplexing node, or in a separate transmitter/receiver space within or on the exterior of the SHC, as determined by the NTCs.

In New York Telephone areas, the customer shall install and maintain all customer-provided facilities within the SHC between its multiplexing node and the entrance manhole outside the SHC or microwave antenna. In New England Telephone areas, NET personnel shall install and maintain all customer-provided facilities within the SHC between the customer's multiplexing node and the entrance manhole or the roof, subject to existing rates as set forth in Section 30.13 of the tariff.

Any space that is not being "efficiently used" as defined in the tariff
is subject to reclamation by the NTCs on 90 days notice if needed to

accommodate another expanded interconnection customer's service request or the NTCs' services. The NTCs have the right to reclaim any space within the SWC on 6 months notice, if needed to fulfill their obligations under state law, federal law or their tariffs.

At the sole option of the NTCs, the antenna support structure for microwave expanded interconnection shall be built, owned and maintained by either the NTCs or by the customer. The NTCs reserve the right to use existing support structures for a customer's antenna, subject to space and capacity limitations. The NTCs also reserve the right to use any unused portion of a support structure owned by a customer for any reason.

The owner of the support structure shall use reasonable efforts to accommodate all requests by other persons to use the support structure for microwave expanded interconnection on a first come, first served basis. The owner of the support structure may charge persons proposing to use the structure (including the Telephone Company) a one-time charge for the incremental costs associated with installing the proposed antenna(s) and a portion of the net book value of the structure as set forth in Section 28.4.2 of the tariff. The owner of the structure may not assess other users of the structure any charges in addition to the one-time charge described above, except that the owner may assess other users a proportional share of its costs to conduct periodic inspections of the structure and NTCs shall assess microwave expanded interconnection customers monthly recurring charges for use of its roof space.

All customer-provided facilities and equipment must conform with the NTCs' technical and safety standards. Customers must also ensure that

their employees, agents and contractors maintain their designated spaces according to the NTCs' standards for health, safety and security for central offices.

The customer shall procure, pay for and keep in force, at its sole cost and expense, \$2 million of Comprehensive General Liability Coverage on an occurrence basis for bodily injury and property damage, \$5 million of Umbrella/Excess Liability Coverage, Risk Property Coverage on a full replacement cost basis for all of the customer's real and personal property located within or upon the SHC and \$2 million of Statutory Horkers Compensation and Employers Liability Coverage.

#### B. <u>Interconnection</u>

The NTCs shall designate a point of termination ("POT") within each SWC as the physical demarcation point between the customer's facilities and equipment and the NTCs' facilities and equipment. The NTCs shall provide a cross connection ("Office Channel Termination" or "OCT") between the customer's point of termination and NTC-provided DS1 or DS3 (electrical) High Capacity service channel terminations, interoffice mileage or multiplexers.

#### C. Service Availability

Expanded interconnection is available to all customers (<u>e.g.</u>, interexchange carriers, competitive access providers and end users) in those central offices listed in the National Exchange Carrier Association

("NECA") Tariff F.C.C. No. 4. Pursuant to Commission Order, the NTCs propose to offer expanded interconnection initially in some 195 SWCs in the NYNEX region for which expanded interconnection is likely to be requested or for which the NTCs have received a request for expanded interconnection. If a customer requests expanded interconnection in other SWCs listed in the NECA Tariff F.C.C. No. 4, the NTCs will file a tariff within 45 days of such request to provide expanded interconnection in the SWC(s) on 45 days notice.

The availability of expanded interconnection in SWCs that are not owned by the NTCs is subject to the consent of the owner of the premises when required by the NTCs' lease, right of way, or other agreement with the owner, or by applicable state or federal law.

Expanded Interconnection with Local Telephone Company Facilities, Memorandum Opinion and Order, CC Docket No. 91-141, FCC 92-552, at ¶ 9, released December 18, 1992.

#### III. COSTS

In this section, and in the attached worksheets, the NTCs provide cost support for permanent expanded interconnection.

#### A. Recurring Costs

#### 1. Multiplexing Node, Roof Space and <u>Transmitter/Receiver Space</u>

The NTCs used data from their Continuing Property Record ("CPR") and Building Inventory System ("BIS") databases to develop the annual investment per SHC square foot for multiplexing node space, roof space and transmitter/receiver space. The NTCs derived a monthly recurring cost per square foot for each SHC by multiplying the annual investment per square foot for the SHC by a carrying charge factor ("CCF") from the Automated Reporting Management Information System ("ARMIS") and then dividing by 12. These calculations are shown in HS-1.

#### 2. DC Power

The NTCs developed the costs for DC power using an engineering study for a typical central office power plant configuration to identify the average investment and power capacity (measured in amps) for a SMC. The NTCs divided power plant investment by capacity of the power plant from the engineering study to derive an average investment per amp. The NTCs then multiplied the average investment per amp by a CCF to derive a cost per amp of \$8.15. These calculation are provided in MS-2.

<sup>6</sup> CPR tracks the NTCs' net investment in land and buildings for each NTC-owned property. BIS tracks the amount of square feet of space in NTC buildings.

#### 3. Cable Space

There are two investment components associated with cable space: (i) the cable vault; and (ii) frames and other hardware which support cables within the SWC. The NTCs identified the costs of the cable vault associated with expanded interconnection by multiplying 0.16 (the ratio of average square feet of vault space to the average square feet of SWC space) by \$3.21 (the average cost per square foot of SHC space as shown in HS-1). The monthly recurring costs of cable vault space associated with a 100 square foot multiplexing node is calculated as follows:

.16  $\times$  \$3.21  $\times$  100 Sq. Ft. = \$51.36

The NTCs identified the costs associated with frames and other hardware by dividing average frame investment by average SWC square feet to derive an average frame investment per square foot of SWC space. The NTCs' average frame investment per square foot is \$80.39. The NTCs multiplied this amount by a CCF of .448183 to derive an annual frame cost of \$39.25 per square foot. The monthly frame cost per square foot was developed by dividing the annual frame cost per square foot by 12. Assuming that an average fiber optic cable is approximately 1 inch in diameter, a fiber optic cable occupies 1/12th of a square foot. The monthly recurring costs of space per linear foot, per cable are as follows:

\$80.39 x 0.488183 x 1/12 x 1/12 = \$0.27

#### 4. Office Channel Terminations (OCTS)

There are four components of investment associated with the DS1 and DS3 OCT rate elements:

- (i) A termination at the NTCs' Digital Service Cross Connection ("DSX") frame;
- (ii) The cable between the DSX frame and the Point of Termination ("POT") intermediate frame:
- (iii) A termination at the NTC side of the POT frame; and
- (iv) A termination at the customer's side of the POT frame.

The NTCs developed the fully distributed monthly recurring costs associated with DS1 and DS3 OCT rate elements by applying ARMIS CCFs to the termination and cable investments associated with providing the OCT. The monthly recurring cost of a DS1 OCT is \$6.43, and the monthly recurring cost of a DS3 OCT is \$80.36. These calculations are provided in HS-3.

These costs are higher than the NTCs' interim expanded interconnection tariff rates. There are several reasons for this. First, the NTCs' interim expanded interconnection rates were based on NYT's state rates (\$3.51 for DS1 and \$35.87 for DS3). These rates, however, did not include any indirect cost loadings. Second, the actual percent utilization of OCT cable and terminations has been substantially lower than the estimated percent utilization factor which underlies NYT's state rates. Third, NYT's experience has shown that actual OCT cable distances under state expanded interconnection are longer than previously estimated, and therefore, OCT cable investments are higher.

The purpose of the utilization factor is to allocate spare investment — the higher the utilization factor, the lower the average investment per OCT.

#### B. Nonrecurring Costs

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1. Multiplexing Node, Roof Space, <u>Transmitter/Receiver Space and Cable Space</u>

The NTCs developed the nonrecurring costs associated with a typical multiplexing node based on the actual nonrecurring costs associated with 12 multiplexing nodes for which the NTCs have rendered bills under state expanded interconnection arrangements. These nonrecurring costs include design and engineering of the space and installation of cable racks, cabinets, caging, lighting and power equipment. The average nonrecurring cost of providing a 100 square foot multiplexing-node is \$54,878. These calculations are provided in WS-4.

The NTCs could not develop nonrecurring costs associated installing customers' microwave antennas or providing support structures. The costs of installing microwave antennas and providing support structures will vary depending upon the customer's requirements, <u>i.e.</u>, the size and required "line of sight" of the antenna. In some instances, a customer's microwave antenna can be mounted on the exterior wall or roof of the central office; in other instances, a support structure 50 feet high or more may be required. The costs of providing support structures will vary greatly depending upon whether an existing support structure can be used to meet the customer's requirements or whether the existing structure needs to be reinforced or modified. In other instances, an

On average, the multiplexing nodes which the NTCs have provided under state expanded interconnection arrangements have been approximately 100 square feet. The actual square footage of these multiplexing nodes varied somewhat due to the physical layout of certain SHC spaces, e.g., building support columns, load bearing walls, etc.

entirely new structure may need to be constructed. The NTCs propose that, at their option, the NTCs will either provide the support structure on an individual case basis, or require the customer to build, own and maintain the support structure at its sole cost and expense.

The NTCs did not calculate nonrecurring costs associated with providing transmitter/receiver space or cable space, because, in New York Telephone SHCs, the customer shall install and maintain all customer-provided facilities within the SHC between its multiplexing node and the entrance manhole or roof. In New England Telephone SHCs, NET personnel shall install and maintain all customer-provided facilities within the SHC between the customer's multiplexing node and the entrance manhole or the microwave antenna, subject to existing rates as set forth in Section 30.13 of the tariff.

#### 2. Office Channel Terminations

The nonrecurring costs associated with establishing an OCT differ depending upon whether the expanded interconnection customer is requesting new Special Access service (which involves establishing an OCT and a Standard Channel Termination) or requesting to "rollover" an existing DS1 or DS3 Standard Channel Termination or OCT service to a new OCT service. In either case, three separate work efforts are required:

(i) the Interstate Carrier Services Center ("ICSC") must receive the customer's service request and issue a service order; (ii) the Circuit Provisioning Center ("CPC") must process the service order and perform other provisioning work; and (iii) the Central Office – Network group must perform the central office or field work associated with the service order. The nonrecurring costs associated with each of these work efforts are shown in MS-5.

The nonrecurring costs associated with establishing a new OCT service and OCT rollovers are as follows:

#### NONRECURRING OCT COSTS

	NEW OCT	ROLLOVER OCT
DS1	\$270.66	\$284.59
DS3	\$393.44	\$407.37

The differences between the nonrecurring costs associated with OCT rollovers and establishing a new OCT service are due to the way ICSC costs are attributed to channel terminations. When a new OCT service is established, the nonrecurring costs of the ICSC are divided equally between the OCT and the Standard Channel Termination. Thus, the ICSC costs attributed to the new OCT service are one-half the ICSC costs associated with issuing the service order. When a customer is rolling over an existing Standard Channel Termination or existing OCT to a new (rollover) OCT, however, all of the ICSC costs associated with issuing the service order must be attributed to the new (rollover) OCT. The ICSC costs associated with OCT rollovers are less than twice those associated with establishing a new OCT service because there are some ICSC cost savings associated with OCT rollovers.

NET's nonrecurring charges per DS1 and DS3 standard channel termination are \$710.00 and \$864.78, respectively. NYT's nonrecurring charges per DS1 and DS3 standard channel termination are \$673.00 and \$929.31, respectively.

#### IV. PRICING

#### A. Recurring Charges

1. Multiplexing Node, Roof Space and Transmitter/Receiver Space

The NTCs propose a single monthly recurring rate per square foot for multiplexing node space, roof space and transmitter/receiver space for NET, and four monthly recurring rates per square foot for multiplexing nodes, roof space and transmitter/receiver space for NYT, depending upon which SHC the customer obtains expanded interconnection. NYT's four monthly recurring rates correspond to the four NYT building space monthly recurring cost "bands" as shown in HS-1. The NTCs propose four monthly recurring rates for space in NYT SHCs because NYT intends to file a similar rate structure for such space in its state expanded interconnection tariffs. The proposed monthly recurring rates per square foot of multiplexing node space, roof space and transmitter/receiver space are shown below.

#### BUILDING SPACE MONTHLY RECURRING RATES PER SO. FT.

NET		\$2.97
NYT		
	Band 1	\$2.20
	Band 2	\$3.11
	Band 3	\$4.00
	Band 4	\$5.33

## 2. DC Power

The NTCs propose to charge \$8.15 per amp for DC power.

#### 3. Cable Space

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The NTCs propose two monthly recurring charges for cable space:

(i) \$51.36 per 100 square feet of multiplexing node space; and (ii) \$0.27

per linear foot, per cable of customer-provided cabling within the SMC.

#### 4. Office Channel Terminations

The NTCs propose to charge \$6.43 per month for a DS1 OCT and \$80.36 per month for a DS3 OCT.

#### B. Nonrecurring Charges

#### 1. Multiplexing Node, Roof Space and Iransmitter/Receiver Space

The NTCs propose a nonrecurring charge of \$54,900 for the construction of a 100 square foot multiplexing node. <sup>10</sup> Twenty percent of this amount (\$10,980.00) is due with the application for service. At the time the NTCs provide the customer their proposal for the design and construction of the multiplexing node, an additional 30% (\$16,470.00) of the nonrecurring charge is due. If the customer withdraws its application for the multiplexing node prior to taking occupancy of the space, the NTCs will return any nonrecurring charges already paid by the customer, less the NTCs' actual expenses incurred prior to the date the application

If a customer requests a multiplexing node larger than 100 square feet, or if a customer requests that the NTCs enlarge its existing 100 square foot multiplexing node, the NTCs propose to assess the customer a nonrecurring charge of \$274.50 per square foot of multiplexing node space in excess of 100 square feet. The NTCs derived this rate by dividing the \$54,900 nonrecurring charge for a 100 square foot multiplexing node by 100, and then dividing again by 2, to reflect that the nonrecurring costs of providing multiplexing node space in excess of 100 square feet is less that the nonrecurring costs of providing the initial 100 square feet of multiplexing node space.

is withdrawn. The balance of the nonrecurring charge (\$27,450) is payable upon occupancy of the multiplexing node by the customer.

The NTCs do not propose a nonrecurring charge for transmitter/receiver space for microwave expanded interconnection. With respect to the installation of microwave antennas for expanded interconnection that require support structures, the NTCs propose that, at their option, the NTCs will either provide the support structure on an individual case basis, or require the customer to build, own and maintain the support structure at its sole cost and expense.

## 2. Cable Space

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The NTCs do not propose a nonrecurring charge for cable space in NYT SHCs, because, in NYT SHCs, the customer is responsible for installing and maintaining its facilities between its multiplexing node and the entrance manhole or microwave antenna. In NET SHCs, however, NET personnel shall install and maintain all customer-provided cable facilities within the SHC between the customer's multiplexing node and the entrance manhole or roof, subject to existing rates as set forth in Section 30.13 of the tariff. These rates are:

	First Half Hour	Each Additional
	or Fraction	Half Hour or
	<u>Thereof</u>	Fraction Thereof
Engineering, Per Engineer		
- Basic Time	<b>\$55.68</b>	\$19.98
<ul><li>Overtime</li></ul>	\$59.72	\$24.02
Technician, Per Technician		
- Basic Time	\$48.13	\$12.43
<ul><li>Overtime</li></ul>	\$51.96	\$16.26
<ul> <li>Premium Time</li> </ul>	\$55.79	\$20.09

#### 3. Office Channel Terminations

The NTCs propose the following nonrecurring charges for establishing new OCT service and for rollovers from an NTC-provided Standard Channel Termination or existing OCT to a new (rollover) OCT:

	NEW OCT	ROLLOVER OCT
DS1	\$270.66	\$284.59
DS3	\$393.44	\$407.37

The NTCs do not propose to assess a nonrecurring charge for rollovers from an existing OCT to a DS1 or DS3 Standard Channel Termination because the NTCs recover the nonrecurring costs associated with such rollovers in the recurring charges for its DS1 and DS3 Standard Channel Termination services.

#### C. FRESH LOOK

The termination charges under the NTCs' current volume and term discount plans for DS1 and DS3 services with terms in excess of three years are equal to or more lenient than those required by the Commission's "fresh look" policy. 11 Therefore, the NTCs do not propose to change the volume and term discount termination provisions contained in the tariff.

<sup>11</sup> Expanded Interconnection Order, at ¶ 202.

## V. WORKPAPERS

WS-1: Building Space Recurring Cost Per Square Foot
WS-2: DC Power Cost
WS-3: Office Channel Termination Monthly Recurring Costs

WS-4: Multiplexing Node Nonrecurring Cost

WS-5: Office Channel Termination Nonrecurring Costs

## BUILDING SPACE RECURRING COST PER SOUARE FOOT

## NEW ENGLAND TELEPHONE

NET LOCATION	ANNUAL INV PER SO. FT.	ANNUAL CCF	ANNUAL COST PER SO. FT.	MONTHLY COST
CALAIS	42.29	0.425355	17.99	\$1.50
WESTFIELD	48.89	0.425355	20.80	1.73
ANDOVER	49.68	0.425355	21.13	1.76
ROXBURY	52.15	0.425355	22.18	1.85
BEDFORD	52.70	0.425355	22.42	1.87
LEXINGTON	55.61	0.425355	23.65	1.97
HELLESLEY	56.20	0.425355	23.90	1.99
GREENFIELD	56.31	0.425355	23.95	2.00
PALMER	• 56.40	0.425355	23.99	2.00
PROVIDENCE				
BROAD STREET	56.79	0.424355	24.16	2.01
HOLYOKE	57.49	0.425355	24.45	2.04
PEABODY	58.07	0.425355	24.07	2.06
AMHERST				
SOUTH PROSPECT	58.23	0.425355	24.77	2.06
ROCKLAND	59.42	0.425355	25.27	2,11
CONCORD	60.15	0.425355	25.59	2.13
DEDHAM	60.3	0.425355	25.65	2.14
BURLINGTON	60.53	0.425355	25.75	2.15
BRAINTREE	61.33	0.425355	26.09	2.17